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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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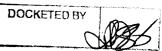
2011 SEP 19 P 4: 09

Arizona Corporation Commission

DOCKETED

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AZ CORP COMMISSION DOCKET CONTROL



IN THE MATTER OF THE PROPOSED AMENDMENTS TO THE PIPELINE SAF

AMENDMENTS TO THE PIPELINE SAFETY RULES R14-5-201, R14-5-202, R14-5-203, R14-5-204 AND R14-5-205.

DOCKET NO. RG-00000A-11-0161

COMMENTS OF UNS GAS, INC.

UNS Gas, Inc. ("UNS Gas"), through undersigned counsel, submits comments to the proposed changes to the Arizona Corporation Commission's pipeline safety rules, codified at Arizona Administrative Code R14-5-201 through R14-2-205. UNS Gas owns, operates, and maintains approximately 59 miles of intrastate natural gas transmission pipelines and approximately 4,183 miles of intrastate distribution mains and services within the State of Arizona. UNS Gas is therefore an interested party to this proceeding.

UNS Gas supports updating the Arizona pipeline safety regulations that recognize the amendments to the federal pipeline safety regulations codified at 49 CFR Parts 191, 192, 193, 195, and 199, revised as of October 1, 2010. UNS Gas recommends that the Commission adopt the proposed amendments to the pipeline safety rules as detailed in the Utilities Division Staff's memorandum dated July 28, 2011 filed in this docket.

RESPECTFULLY SUBMITTED this 19th day of September 2011.

UNS Gas, Inc.

Bv

Michael W. Patten

ason D. Gellman

ROSHKA DEWULF & PATTEN, PLC.

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1 Bradley S. Carroll, Esq. 2 UniSource Energy Services One South Church Avenue 3 Tucson, Arizona 85701 4 Attorneys for UNS Gas, Inc. 5 Original and 13 copies of the foregoing filed this 19th day of September, 2011, with: 6 7 **Docket Control** Arizona Corporation Commission 8 1200 West Washington Street Phoenix, Arizona 85007 9 Copy of the foregoing hand-delivered/mailed this 19th day of September, 2011, to: 10 11 Sarah Harpring, Esq. Administrative Law Judge 12 Hearing Division Arizona Corporation Commission 13 1200 West Washington Phoenix, Arizona 85007 14 Charles Haines, Esq. 15 Legal Division Arizona Corporation Commission 16 1200 West Washington Street Phoenix, Arizona 85007 17 Steve Olea 18 Director, Utilities Division Arizona Corporation Commission 19 1200 West Washington Street Phoenix, Arizona 85007 20 21 By Man Sprolets 22

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